

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:21CV22
)	
Plaintiff,)	JUDGE JACK ZOUHARY
)	
v.)	
)	
SHAFFER PHARMACY, INC.; THOMAS)	<u>MOTION TO RESCHEDULE HEARING</u>
TADSEN; and WILSON BUNTON,)	<u>ON MOTION FOR PRELIMINARY</u>
)	<u>INJUNCTION AND REQUEST FOR</u>
Defendants.)	<u>VIRTUAL HEARING</u>

Counsel for the United States respectfully requests that this Court reschedule the Hearing on the Motion for Preliminary Injunction currently set for Friday, January 22, 2021 at 1:30 p.m. Counsel for the United States' was just informed that the expert witness, Dr. Carl Gainor, has a medical appointment on that date that would be difficult to reschedule. Counsel for the United States, and all of its witnesses, are available January 25-28, at any time.

Counsel for the United States further requests that the hearing take place via videoconference. First, two counsel for the United States are located in Washington, D.C., and remain under a maximum telework mandate due to COVID-19. Second, Dr. Gainor resides in Pennsylvania, a state which currently remains on the Ohio Department of Health's travel

advisory list due to high positivity rates of COVID-19. Pursuant to the current travel advisory, those traveling from Pennsylvania should quarantine for fourteen days upon arriving in Ohio. To expedite the hearing while still complying with COVID-19 safety protocols set by the Ohio Department of Health, counsel for the United States requests that the hearing be conducted virtually.

Respectfully submitted,

BRIDGET M. BRENNAN
Acting United States Attorney
Northern District of Ohio

JOHN V. COGHLAN
Deputy Assistant Attorney General of the
Federal Programs Branch
United States Department of Justice
Civil Division

By: /s/Patricia M. Fitzgerald

Patricia M. Fitzgerald (PA: 308973)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
(216) 622-3779
(216) 522-2404 (facsimile)
Patricia.Fitzgerald2@usdoj.gov

Daniel J. Feith
Deputy Assistant Attorney General
Civil Division

Gustav W. Eyler
Director, Consumer Protection Branch

Angelita Cruz Bridges (0072688)
Assistant United States Attorney
Four Seagate, Suite 308
Toledo, OH 43604-2624
(419) 259-6376
(419) 259-6360 (facsimile)
Angelita.Bridges@usdoj.gov

Scott B. Dahlquist (VA: 76646)
Maryann N. McGuire (VA: 78812)
Trial Attorneys
Consumer Protection Branch
450 5th Street, NW, Suite 6300
Washington, D.C. 20001
(202) 532-4520
(202) 514-8742 (facsimile)
Scott.B.Dahlquist@usdoj.gov
Maryann.N.McGuire@usdoj.gov